

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MARY THERESA CAHILL,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 08 C 255
	)	
SMITH & NEPHEW, INC.,	)	District Judge Darrah
	)	
Defendants.	)	Magistrate Brown

**AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER**

Smith & Nephew, Inc. moves this Honorable Court for entry of the agreed protective order. In support, the Smith & Nephew, Inc. states as follows:

1. This matter involves product liability claims regarding an orthopedic implant.
2. Rush North Shore Hospital claims to be the owner of the implant which the plaintiff claims is unreasonably dangerous.
3. Plaintiff has alleged that Smith & Nephew, Inc was the manufacturer of the subject implant.
4. Rush North Shore Hospital tendered the subject implant to the plaintiff for inspection pursuant to a non-destruction protective order which had been entered by the state court prior to removal.
5. All parties have agreed that plaintiff's consultants may ship the subject implant directly to Smith & Nephew, Inc. for their inspection provided that no destructive testing takes place.
6. All interested parties have agreed to the protective order.

WHEREFORE, the parties request entry of the agreed protective order.

Respectfully submitted,

Smith & Nephew, Inc.

By: /s/ Anthony J. Monaco  
One of its Attorneys

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